

AMEDEO DISCEPOLO

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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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CARMELO MILLAN, Individually:
and on Behalf of All Other :
Persons Similarly Situated, :
Plaintiff, :
vs. :
CITIGROUP, INC., and :
CITIGROUP TECHNOLOGY, INC., :
Defendants. : No. 07-CIV-3769

- - -
Wednesday, February 20, 2008
- - -

Oral deposition of
AMEDEO DISCEPOLO, taken at the Locks Law Firm,
110 East 55th Street, New York, New York,
commencing at 11:05 a.m., before Jennifer S.
Walker, a Federally Approved Registered
Professional Reporter and Notary Public.

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1 Q. A programmer?

2 A. That's how I would equate it.

3 Q. Did Mr. Millan ever work as a
4 computer systems analyst?

5 A. I have no idea.

6 Q. Under you, did he ever work in
7 the lab as a computer systems analyst?

8 A. Not in that term I wouldn't use
9 it, no.

10 Q. Did he ever do any computer
11 programming when he reported to you?

12 A. If we considered creating
13 databases and spreadsheet files to keep track
14 of the inventory and the elevation drawings
15 and the connectivity database, yes, I would
16 consider that.

17 Q. Did he actually create the
18 database, or did he enter information into an
19 already existing database?

20 A. As far as I know, he built the
21 database.

22 Q. What kind of a database was it?

23 A. Just an Excel database. He
24 laid out the field structure, he figured